

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MEGAN LUNDY, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

IDEANOMICS, INC., ALFRED POOR,  
BRUNO WU, AND CONOR MCCARTHY,

Defendants.

No. 1:20-CV-04944-GBD

**JOINT STIPULATION**

**WHEREAS** Plaintiff Megan Lundy filed a complaint (the “Complaint,” ECF No. 1) on behalf of a putative class on June 28, 2020, against defendants Ideanomics, Inc. (“Ideanomics”), Alfred Poor, Bruno Wu, and Conor McCarthy (each an “Individual Defendant” and collectively with Ideanomics, “Defendants”) for violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934.

**WHEREAS** pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(3), any member of the putative class wishing to serve as lead plaintiff (“Lead Plaintiff”) in this action must so move the Court on or before August 27, 2020.

**WHEREAS** pursuant to Federal Rule of Civil Procedure Rule 12(a)(1)(A)(i), Ideanomics is currently obligated to move, answer, or otherwise respond to the Complaint on or before July 28, 2020.

**NOW THEREFORE**, the parties AGREE AND STIPULATE that:

- (1) Venable LLP, as counsel for Defendants, waives service on behalf of the Individual Defendants. Defendant Ideanomics has already been served. *See* ECF No. 8.
- (2) Defendants’ deadline to move, answer, or otherwise respond to the Complaint will be extended until after a Lead Plaintiff is appointed and an amended complaint is filed.
- (3) Within 10 days of entry of an order appointing a Lead Plaintiff, Defendants and Lead Plaintiff will jointly submit for the Court’s consideration a proposed schedule for the filing of an amended complaint, Defendants’ response to the same, and all briefing associated with any motion(s) to dismiss.

Dated: July 22, 2020

Respectfully submitted,

**VENABLE LLP**

/s/ George Kostolampros

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